

1 Andrew H. Wilson
2 WILSON, RYAN & CAMPILONGO
3 235 Montgomery Street
4 Suite 450
5 San Francisco, California 94104
6 (415) 391-3900

7 Laurie J. Bartilson
8 BOWLES & MOXON
9 6255 Sunset Boulevard
10 Suite 2000
11 Hollywood, California 90028
12 (213) 953-3360

13 Attorneys for Plaintiff
14 CHURCH OF SCIENTOLOGY INTERNATIONAL

RECEIVED

AUG 19 1993

HUB LAW OFFICES

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF LOS ANGELES

17 CHURCH OF SCIENTOLOGY)	CASE NO. BC 084642
18 INTERNATIONAL, a California)	
19 not-for-profit religious)	
20 corporation;)	NOTICE OF DEPOSITION AND
21)	PRODUCTION OF DOCUMENTS,
22 Plaintiff,)	CUSTODIAN OF RECORDS
23)	ENTERTAINMENT TELEVISION
24 vs.)	COMPANY
25)	[C.C.P. § 2020 (D)]
26)	
27 GERALD ARMSTRONG; THE GERALD)	TRIAL DATE: None
28 ARMSTRONG CORPORATION, a)	DISCOVERY CUT-OFF: None
29 California corporation; DOES)	MOTION CUT-OFF: None
30 1-25 INCLUSIVE)	
31)	
32 Defendants.)	
33)	

34 TO DEFENDANTS GERALD ARMSTRONG, THE GERALD ARMSTRONG
35 CORPORATION AND THEIR ATTORNEY OF RECORD:

36 PLEASE TAKE NOTICE that plaintiff Church of Scientology
37 International will take the deposition of the Custodian of
38 Records, Entertainment Television Company, on September 8, 1993,
39 at 10:00 a.m. at the offices of Bowles & Moxon, 6255 Sunset Blvd.
40 Suite 2000, Hollywood, California 90028 (213) 953-3360. This

1 deposition will be taken pursuant to the attached subpoena for
2 records only. There will be no interrogation of the deponent.

3 DATED: August 10, 1993

BOWLES & MOXON

4
5
6 By: 

7 Laurie J. Bartilson

8 Andrew H. Wilson
9 WILSON, RYAN & CAMPILONGO

10 Attorneys for Plaintiff
11 CHURCH OF SCIENTOLOGY
12 INTERNATIONAL
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Laurue J. Bartilson BOWLES & MOXON 6255 Sunset Blvd. Suite 2000 Hollywood, CA 90028 ATTORNEY FOR (Name): Church of Scientology International	TELEPHONE NO.: (213) 953-3360	FOR COURT USE ONLY
NAME OF COURT: Los Angeles Superior Court STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: Los Angeles, CA 90012 CITY AND ZIP CODE: BRANCH NAME:		
PLAINTIFF/PETITIONER: Church of Scientology International DEFENDANT/RESPONDENT: Gerald Armstrong, The Gerald Armstrong Corp.,		
DOES 1-25 <div style="text-align: center;">DEPOSITION SUBPENA For Production of Business Records</div>		
		CASE NUMBER: BC 084642

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name): Custodian of Records, ENTERTAINMENT TELEVISION COMPANY, 5670 Wilshire Blvd., Los Angeles, CA 90036

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Atkinson Baker Court Reporters
 Date: Sept. 8, 1993 Time: 10:00 a.m.
 Address: 6255 Sunset Blvd., Suite 2000, Hollywood, CA 90028

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:

See attached Exhibit A

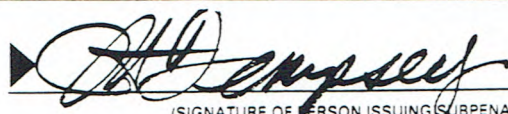
☐ Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: August 16, 1993

JAMES H. DEMPSEY

(PRINT OR TYPE NAME)


 (SIGNATURE OF PERSON ISSUING SUBPENA)

EXECUTIVE OFFICER/CLERK OF THE SUPERIOR COURT

(TITLE)

(See reverse for proof of service)

PLAINTIFF PETITIONER:	Church of Scientology International	CASE NUMBER
DEFENDANT RESPONDENT:	Gerald Armstrong, Gerald Armstrong Corporation, DOES 1-25	BC 084642

PROOF OF SERVICE OF DEPOSITION SUBPENA—BUSINESS RECORDS

1. I served this Deposition Subpena—Business Records by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.
Amount:\$ _____

(2) ☐ Copying fees were paid
Amount:\$ _____

f. Fee for service:\$ _____

2. I received this subpoena for service on (date):

3. Person serving:

- a. ☐ Not a registered California process server.
- b. ☐ California sheriff, marshal, or constable.
- c. ☐ Registered California process server.
- d. ☐ Employee or independent contractor of a registered California process server.
- e. ☐ Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. ☐ Registered professional photocopier.
- g. ☐ Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff, marshal, or constable use only)

I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

EXHIBIT A

The Custodian of Records of ENTERTAINMENT TELEVISION COMPANY is requested to produce all of the documents as described below within his possession, custody or control.

A. DEFINITIONS AND EXPLANATIONS:

1. As used herein, the term "document" includes all written, typewritten, printed and graphic materials of whatever kind or nature, including but not limited to correspondence, notes, memoranda, telegrams, cables, telexes, telecopies, panafaxes, publications, contracts, agreements, minutes, offers, analyses, projections, studies, books, papers, records, reporters, lists, calendars, diaries, statements, complaints, filings with any court, tribunal or governmental agency, corporate minutes, agreements, transcripts, summaries, agendas, bills, invoices, receipts, estimates, evaluations, instructions, bulletins, advertisements, periodicals, accounting records, checks, check stubs, check registers, cancelled checks, money orders, negotiable instruments, sound recordings, video recordings, films, photographs, tapes, transcriptions, reports, grade reports, progress reports, disciplinary reports and computer programs.

2. As used herein, the term "document" further means all writings, originals and duplicates as defined in California Evidence Code Sections 250, 255 and 260, whether in draft form or otherwise, including but not limited to, copies and non-identical copies (whether different from the originals because of notes or marks made on or attached to said copies or otherwise).

1 3. The words "and" and "and/or" as used herein shall both
2 mean "and/or".

3 4. The term "you" as used herein shall mean the Custodian of
4 Records of ENTERTAINMENT TELEVISION COMPANY.

5 5. The words "relate" or "relating" means, in addition to
6 its customary and usual meaning, addressing, discussing,
7 referring, pertaining, reflecting, evidencing, stating, showing,
8 analyzing, summarizing or recording.

9 6. If you do not have the original of the documents you have
10 in your possession, please state with specificity:

11 (a) With respect to each individual or entity who to the
12 best of your knowledge, information or belief has possession or
13 custody of the original or any copy of the document;

14 (b) The name and last known business or residential
15 addresses and telephone numbers;

16 (c) The employer and job title or capacity at the time that
17 he/she had possession of the document or copy.

18 B. DOCUMENTS AND THINGS TO BE PRODUCED:

19 1. An authentic video copy of the "E News Special Report"
20 that ran on ENTERTAINMENT TONIGHT on August 5, 1993, entitled
21 "Stars and Spirituality, Controversial Spirituality".

22 2. Any transcripts that have been prepared from the "E News
23 Special Report" that ran on ENTERTAINMENT TONIGHT on August 5,
24 1993, entitled "Stars and Spirituality, Controversial
25 Spirituality".

26
27
28 H:\ARMSTRON\ETVEX.A

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Los Angeles, California 90028.

On August 16, 1993, I served the foregoing document described as NOTICE OF DEPOSITION AND PRODUCTION OF DOCUMENTS, CUSTODIAN OF RECORDS ENTERTAINMENT TELEVISION COMPANY on interested parties in this action,

[] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
HUB Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

GERALD ARMSTRONG
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

PAUL MORANTZ
P.O. Box 511
Pacific Palisades, CA 90272

[X] BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of

business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on August 16, 1993 at Los Angeles, California.

[] ****(BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

Executed on _____, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Print or Type Name

Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)